

EXHIBIT A

2 UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT OF NEW YORK

4 TRAVELERS CASUALTY AND SURETY COMPANY as
5 Administrator for RELIANCE INSURANCE
COMPANY,

6 Plaintiff,

7 -against-

8 DORMITORY AUTHORITY-STATE OF NEW YORK, TDX
9 CONSTRUCTION CORP. and KOHN PEDERSEN FOX
ASSOCIATES, P.C.,

10 Defendants.

11 Case No. 08-CV-6915 (DLC)

12 (CAPTION CONTINUED)

13
14 July 24, 2008

15 10:21 a.m.

16
17 DEPOSITION of ATHENA CURIS,
18 taken by Defendant, pursuant to Notice,
19 held at the offices of HOLLAND & KNIGHT
20 LLP, 195 Broadway, New York, New York
21 before Wayne Hock, a Notary Public of the
22 State of New York.

1 A. Curis

2 asking, please let me know that and I
3 will be happy to rephrase it.

4 Q. Are you currently employed?

5 A. Yes.

6 Q. Who is your employer?

7 A. I'm self-employed, Fox

8 Industries.

9 Q. You say self-employed.

10 Are you the owner of that
11 company?

12 A. One of the principals, yes.

13 Q. Who are the other principals?

14 A. Steve Plagianos.

15 Q. Where is Fox Industries located?

16 A. One Commerce Street in Brooklyn.

17 Q. How long have you been employed
18 by Fox Industries?

19 A. From September of 2002.

20 Q. And in September of 2002, were
21 you a principal of Fox Industries?

22 A. Yes.

23 Q. Where were you employed prior to
24 Fox Industries?

25 A. Trataros Construction.

1 A. Curis

2 Q. How long were you employed at
3 Trataros Construction?

4 A. On or about fifteen years.

5 Q. When you started at Trataros
6 Construction, I'm assuming it would have
7 been about 1987; does that sound right?

8 A. On or about, yeah.

9 Q. When you started at Trataros,
10 what was your title or position?

11 A. I was an estimator.

12 Q. For how long were you an
13 estimator?

14 A. About a year.

15 Q. And after that year, did your
16 job title change?

17 A. Yes, it did.

18 Q. And what did it change to?

19 A. Project coordinator.

20 Q. And how long did you hold that
21 title?

22 A. Several years, four or five
23 years.

24 Q. And at the end of that four or
25 five-year period, did your title then

1 A. Curis

2 change again?

3 A. Yes, it did.

4 Q. What did it change to?

5 A. Project manager.

6 Q. How long did you hold that
7 title?

8 A. Pretty much until the end of my
9 time with Trataros.

10 Q. When did you leave Trataros?

11 A. Just prior to Fox Industries
12 being incorporated.

13 Q. Why did you leave Trataros?

14 A. Trataros was no longer in
15 business.

16 Q. Were you at any time a principal
17 of Trataros Construction?

18 A. No.

19 Q. Do you know who the principals
20 of Trataros Construction were?

21 A. Gus Trataros.

22 Q. Anyone else?

23 A. I'm not really sure.

24 Q. Did Steve Plagianos work for
25 Trataros when you were there?

1 A. Curis

2 Q. What was your first job while
3 you -- after you got out of Pratt
4 Institute?

5 A. Breger Terjesen.

6 Q. When you left Trataros
7 Construction, was it still a going
8 concern?

9 MS. BONACCI: Objection.

10 THE WITNESS: I'm not sure what
11 happens here.

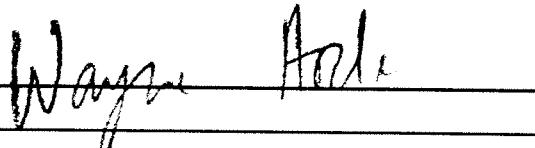
12 MS. BONACCI: I'll make an
13 objection because I have an issue with
14 the way the question is asked or the
15 form of it and then, if you still
16 understand the question, then you
17 would answer it if you still
18 understand it. If you don't
19 understand it, ask him to --

20 A. Please clarify.

21 Q. When you left Trataros, were
22 they still in business?

23 A. No.

24 Q. When did Trataros' business
25 cease?

1
2 CERTIFICATION BY REPORTER
34 I, Wayne Hock, a Notary Public of the
5 State of New York, do hereby certify:6 That the testimony in the within
7 proceeding was held before me at the
8 aforesaid time and place;9 That said witness was duly sworn
10 before the commencement of the testimony,
11 and that the testimony was taken
12 stenographically by me, then transcribed
13 under my supervision, and that the within
14 transcript is a true record of the
15 testimony of said witness.16 I further certify that I am not
17 related to any of the parties to this
18 action by blood or marriage, that I am not
19 interested directly or indirectly in the
20 matter in controversy, nor am I in the
21 employ of any of the counsel.22 IN WITNESS WHEREOF, I have hereunto
23 set my hand this 29th day of July
24, 2008.25 

VERITEXT REPORTING COMPANY

212-267-6868

516-608-2400